



campaign for a commercial-free childhood

April 15, 2021

Mark Zuckerberg
Chief Executive Officer
Facebook, Inc.
1601 Willow Road
Menlo Park, CA 94025

Dear Mr. Zuckerberg,

We are writing to urge you to cancel plans to launch a version of Instagram for children under 13.

According to an internal memo published by BuzzFeed, Facebook plans to build “a version of Instagram that allows people under the age of 13 to safely use Instagram for the first time.”¹ We agree that the current version of Instagram is not safe for children under 13 and that something must be done to protect the millions of children who have lied about their age to create Instagram accounts, especially since their presence on the platform could be a violation of the Children’s Online Privacy Protection Act (COPPA) and other nations’ privacy laws.

However, launching a version of Instagram for children under 13 is not the right remedy and would put young users at great risk.

In the elementary and middle school years, children experience incredible growth in their social competencies, abstract thinking, and sense of self. Finding outlets for self-expression and connection with their peers become especially important. We are concerned that a proposed Instagram for kids would exploit these rapid developmental changes.

A growing body of research demonstrates that excessive use of digital devices and social media is harmful to adolescents. Instagram, in particular, exploits young people’s fear of missing out and desire for peer approval to encourage children and teens to constantly check their devices and share photos with their followers. The platform’s relentless focus on appearance, self-presentation, and branding presents challenges to adolescents’ privacy and wellbeing.

Younger children are even less developmentally equipped to deal with these challenges, as they are learning to navigate social interactions, friendships, and their inner sense of strengths and challenges during this crucial window of development. Moreover, young children are highly

¹ Ryan Mac and Craig Silverman, “Facebook Is Building An Instagram For Kids Under The Age Of 13,” *BuzzFeed News*, March 18, 2021, <https://www.buzzfeednews.com/article/ryanmac/facebook-instagram-for-children-under-13>.

persuadable by algorithmic prediction of what they might click on next, and we are very concerned about how automated decision making would determine what children see and experience on a kids' Instagram platform.

Children between the ages of 10 and 12 who have existing Instagram accounts are unlikely to migrate to a “babyish” version of the platform after they have experienced the real thing. The true audience for a kids' version of Instagram will be much younger children who do not currently have accounts on the platform. While collecting valuable family data and cultivating a new generation of Instagram users may be good for Facebook's bottom line, it will likely increase the use of Instagram by young children who are particularly vulnerable to the platform's manipulative and exploitative features.

Excessive screen media use and social media use is linked to a number of risks for children and adolescents, including obesity,² lower psychological wellbeing,³ decreased happiness,⁴ decreased quality of sleep,^{5,6} increased risk of depression,⁷ and increases in suicide-related outcomes such as suicidal ideation, plans, and attempts.⁸ Fifty-nine percent of US teens have reported being bullied on social media,⁹ an experience which has been linked to increased risky behaviors such as smoking and increased risk of suicidal ideation.¹⁰ Adolescent girls report feeling pressure to post sexualized selfies as a means of generating attention and social acceptance from their peers.¹¹ Additionally, social media platforms including Instagram are rife with child sexual abuse materials and online exploitation of young users – in 2020 alone, Facebook and Instagram

² Robinson, T. N., Banda, J. A., Hale L., Lu, A. S., Fleming-Milici, F., Calvert, S. L., Wartella, E. (2017). Screen media exposure and obesity in children and adolescents. *Pediatrics*, 140(Supplement 2), S97-S101. doi:[10.1542/peds.2016-1758K](https://doi.org/10.1542/peds.2016-1758K)

³ Jean M. Twenge and W. Keith Campbell, “Media Use Is Linked to Lower Psychological Well-Being: Evidence from Three Datasets,” *Psychiatric Quarterly* 90, no. 2 (June 1, 2019): 311–31, <https://doi.org/10.1007/s11126-019-09630-7>.

⁴ Liz Twigg, Craig Duncan, and Scott Weich, “Is Social Media Use Associated with Children's Well-Being? Results from the UK Household Longitudinal Study,” *Journal of Adolescence* 80 (April 1, 2020): 73–83, <https://doi.org/10.1016/j.adolescence.2020.02.002>.

⁵ Ben Carter et al., “Association Between Portable Screen-Based Media Device Access or Use and Sleep Outcomes: A Systematic Review and Meta-Analysis,” *JAMA Pediatrics* 170, no. 12 (December 1, 2016): 1202–8, <https://doi.org/10.1001/jamapediatrics.2016.2341>.

⁶ Sakari Lemola et al., “Adolescents' Electronic Media Use at Night, Sleep Disturbance, and Depressive Symptoms in the Smartphone Age,” *Journal of Youth and Adolescence* 44 (February 1, 2014), <https://doi.org/10.1007/s10964-014-0176-x>.

⁷ Ibid.

⁸ Jean M. Twenge et al., “Increases in Depressive Symptoms, Suicide-Related Outcomes, and Suicide Rates Among U.S. Adolescents After 2010 and Links to Increased New Media Screen Time,” *Clinical Psychological Science* 6, no. 1 (January 1, 2018): 3–17, <https://doi.org/10.1177/2167702617723376>.

⁹ “A Majority of Teens Have Experienced Some Form of Cyberbullying,” *Pew Research Center: Internet, Science & Tech* (blog), September 27, 2018, <https://www.pewresearch.org/internet/2018/09/27/a-majority-of-teens-have-experienced-some-form-of-cyberbullying/>.

¹⁰ Mitch van Geel, Paul Vedder, and Jenny Tanilon, “Relationship Between Peer Victimization, Cyberbullying, and Suicide in Children and Adolescents: A Meta-Analysis,” *JAMA Pediatrics* 168, no. 5 (May 1, 2014): 435–42, <https://doi.org/10.1001/jamapediatrics.2013.4143>.

¹¹ Giovanna Mascheroni, Jane Vincent, and Estefanía Jimenez, “‘Girls Are Addicted to Likes so They Post Semi-Naked Selfies’: Peer Mediation, Normativity and the Construction of Identity Online,” *Cyberpsychology: Journal of Psychosocial Research on Cyberspace* 9, no. 1 (May 1, 2015), <https://doi.org/10.5817/CP2015-1-5>.

reported 20 million child sexual abuse images.¹² Instagram has faced criticism for failing to respond to reports of exploitation in a timely manner.¹³ The rise in screen time due to the pandemic has further increased the risk of these harms.¹⁴

Research has found that Instagram in particular poses a number of serious challenges to young people's wellbeing. The Royal Society for Public Health rated Instagram as the worst social media platform for youth mental health.¹⁵ Increased time on Instagram is linked to an increased risk for eating disorders for users.¹⁶ Cyberbullying is rampant on Instagram,¹⁷ and police reports in the UK documented more cases of sexual grooming on Instagram¹⁸ than any other platform.¹⁹

Instagram's focus on photo sharing and appearance makes the platform particularly unsuitable for children who are in the midst of crucial stages of developing their sense of self. The platform encourages users to upload videos and photos to receive likes and comments from other users; this can lead young people to obsessively check Instagram for reactions to their posts. In addition, editing photos and videos and using filters to present an idealized version of oneself is the norm on Instagram. Children and teens (especially young girls) have learned to associate overly sexualized, highly edited photos of themselves with more attention on the platform and popularity among their peers.^{20, 21}

Experimental research has found that adult women rate their own appearance lower after viewing celebrity profiles on Instagram.²² For developing children, the constant pressure to compare themselves to others is likely to have even more concerning effects. As clinical psychologist Bethany Cook notes:

¹² Tom Porter, "Facebook Reported More than 20 Million Child Sexual Abuse Images in 2020, More than Any Other Company," *Business Insider*, February 26, 2021, <https://www.businessinsider.com/facebook-instagram-report-20-million-child-sexual-abuse-images-2021-2>.

¹³ Taylor Lorenz, "Teens Are Spamming Instagram to Fight an Apparent Network of Child Porn," *The Atlantic*, January 8, 2019, <https://www.theatlantic.com/technology/archive/2019/01/meme-accounts-are-fighting-child-porn-instagram/579730/>.

¹⁴ Olivia Solon, "Child Sexual Abuse Images and Online Exploitation Surge during Pandemic," *NBC News*, April 23, 2020, <https://www.nbcnews.com/tech/tech-news/child-sexual-abuse-images-online-exploitation-surge-during-pandemic-n1190506>

¹⁵ Royal Society for Public Health, "#StatusofMind" (Royal Society for Public Health, May 2017), <https://www.rsph.org.uk/our-work/campaigns/status-of-mind.html>.

¹⁶ Pixie G. Turner and Carmen E. Lefevre, "Instagram Use Is Linked to Increased Symptoms of Orthorexia Nervosa," *Eating and Weight Disorders: EWD* 22, no. 2 (June 2017): 277–84, <https://doi.org/10.1007/s40519-017-0364-2>.

¹⁷ Taylor Lorenz, "Teens Are Being Bullied 'Constantly' on Instagram," *The Atlantic*, October 10, 2018, <https://www.theatlantic.com/technology/archive/2018/10/teens-face-relentless-bullying-instagram/572164/>

¹⁸ J. Balakrishnan and M. D. Griffiths, "An Exploratory Study of 'Selfitis' and the Development of the Selfitis Behavior Scale," *International Journal of Mental Health and Addiction*, 2017b.

¹⁹ "Instagram Biggest for Child Grooming Online - NSPCC Finds," *BBC News*, March 1, 2019, sec. UK, <https://www.bbc.com/news/uk-47410520>.

²⁰ Mascheroni, Vincent, and Jimenez, "'Girls Are Addicted to Likes so They Post Semi-Naked Selfies.'"

²¹ Trudy Hui Hui Chua and Leanne Chang, "Follow Me and like My Beautiful Selfies: Singapore Teenage Girls' Engagement in Self-Presentation and Peer Comparison on Social Media," *Computers in Human Behavior* 55 (February 1, 2016): 190–97, <https://doi.org/10.1016/j.chb.2015.09.011>.

²² Marika Tiggemann et al., "The Effect of Instagram 'Likes' on Women's Social Comparison and Body Dissatisfaction," *Body Image* 26 (September 1, 2018): 90–97, <https://doi.org/10.1016/j.bodyim.2018.07.002>.

We all know social media — especially Instagram — allows us control over what we share with the outside world. Many of us prefer to show our “best light” and/or a “filtered” version of our life. When children see this version of life and then compare it to their own, it often creates feelings of anger, frustrations, resentment, depression, and stress they don't know how to emotionally process on their own. It doesn't matter if you explain to them “it's all fake,” because the part of their brain needed to fully comprehend and understand this concept isn't fully developed until around the age 21-25.²³

Instagram also subjects its users to intense commercial pressure, which is particularly unfair to developing children. A recent analysis by digital monitoring agency Sprout Social revealed that *one in every three* Instagram posts is an advertisement,²⁴ while other research has found that undisclosed sponsored posts are rampant on Instagram.²⁵ The Instagram business model, which relies on maximizing engagement and monetizing sensitive personal information, is incongruent with children's right to privacy and their need for a wide array of offline activities and face-to-face interactions.

Finally, Facebook's long track record of exploiting young people and putting them at risk makes the company particularly unsuitable as the custodian of a photo sharing and social messaging site for children. Leaked documents have revealed that Facebook boasted to advertisers that it could target teens at the exact moment they were feeling bad about themselves, including when they have negative thoughts about their bodies.²⁶ Another report from *Reveal* showed that Facebook employees referred to children who racked up thousands of dollars in credit card charges through in-game purchases as “whales,” a term casinos use to classify incredibly lucrative high rollers.²⁷ In 2019, a design flaw in Facebook's Messenger Kids allowed young children to circumvent parental controls and chat with strangers.²⁸ Research published in 2020 showed that vast amounts of data from apps played by kids have been sent to the Facebook Graph database,²⁹ yet no effort has been made by your company to address the problem of the children's data that you possess or process for marketing purposes.

In short, an Instagram site for kids will subject young children to a number of serious risks and will offer few benefits for families. As Senators Markey and Blumenthal and Representatives

²³ Murphy Moroney, “What Parents Should Know About Instagram's New App For Kids Under 13,” POPSUGAR Family, March 19, 2021, <https://www.popsugar.com/node/48227541>.

²⁴ “The Most Important Instagram Statistics You Need to Know for 2021” (Sprout Social, February 25, 2021), <https://sproutsocial.com/insights/instagram-stats/>.

²⁵ “65% of Sponsored Instagram Posts Are Not Labeled as Ads, Per New Advertising Watchdog Probe,” *The Fashion Law* (blog), March 19, 2021, <https://www.thefashionlaw.com/65-of-sponsored-instagram-posts-are-actually-labeled-as-ads-per-new-advertising-watchdog-probe/>.

²⁶ Sam Levin, “Facebook Told Advertisers It Can Identify Teens Feeling ‘insecure’ and ‘Worthless,’” *The Guardian*, May 1, 2017, sec. Technology, <http://www.theguardian.com/technology/2017/may/01/facebook-advertising-data-insecure-teens>.

²⁷ Nathan Halverson, “Facebook Knowingly Duped Game-Playing Kids and Their Parents out of Money,” *Reveal*, January 25, 2019, <https://revealnews.org/article/facebook-knowingly-duped-game-playing-kids-and-their-parents-out-of-money/>.

²⁸ Russell Brandom, “Facebook Design Flaw Let Thousands of Kids Join Chats with Unauthorized Users,” *The Verge*, July 22, 2019, <https://www.theverge.com/2019/7/22/20706250/facebook-messenger-kids-bug-chat-app-unauthorized-adults>.

²⁹ Fangwei Zhao et al., “Data Collection Practices of Mobile Applications Played by Preschool-Aged Children,” *JAMA Pediatrics*, September 8, 2020, e203345, <https://doi.org/10.1001/jamapediatrics.2020.3345>.

Castor and Trahan [wrote to you](#), “[I]f Facebook’s objective is to decrease the number of users under the age of 13 on its current Instagram platform, it should invest in efforts to do that directly.”³⁰ Such efforts to protect children and comply with the Children’s Online Privacy Protection Act and other privacy laws shouldn’t be contingent on your ability to monopolize and monetize children’s attention on another platform.

According to your congressional testimony, Instagram for kids is in the early planning stages. We urge you to abandon those plans. Doing so would send a strong message that Facebook understands the vast concerns about the effects its business model is having on young people, and is open to solutions that truly benefit children and teens, not just Facebook’s market share.

We would welcome the opportunity to discuss this matter further.

Sincerely,

ORGANIZATIONS:

Campaign for a Commercial-Free Childhood
5Rights Foundation, UK
Accountable Tech
Africa Digital Rights' Hub, Ghana
Artist Rights Alliance
Australian Council on Children and the Media
Berkeley Media Studies Group
Center for Digital Democracy
Center for Humane Technology
Centre for Health Science and Law, Canada
Centre for Justice and Crime Prevention (CJCP), South Africa
Child Online Africa, Ghana
Children and Screens: Institute of Digital Media and Child Development
Common Sense
Consumer Action
Consumer Federation of America
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Defending the Early Years
Electronic Privacy Information Center (EPIC)
Every Child Protected Against Trafficking UK (ECPAT UK)
Global Action Plan UK
Kidscape
Media Education Foundation
Network for Public Education
New Economics Foundation

³⁰ Edward J. Markey et al., “Letter to Mark Zuckerberg,” April 5, 2021, https://www.markey.senate.gov/imo/media/doc/instagram_kids_letter.pdf.

Norwegian Cancer Society
Obligation, Inc.
Parent Coalition for Student Privacy
Parents Television and Media Council
ParentsTogether Action
Peace Educators Allied for Children Everywhere (P.E.A.C.E.)
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